



Kristina Grimshaw  
[kgrimshaw@fglawllc.com](mailto:kgrimshaw@fglawllc.com)

**Via ECF**

Honorable Robyn F. Tarnofsky  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 703  
New York, New York 10007

September 13, 2024

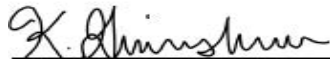
Re: Thomas v. VNS Health (23-cv-08821-AT-RFT)

Dear Judge Tarnofsky:

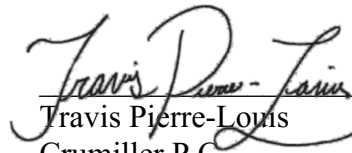
We write jointly with counsel for Plaintiff Anne Thomas (“Thomas”) to request that the Court hold in abeyance all discovery and case management deadlines in the above-referenced case *sine die*. The parties attended a private mediation on September 11, 2024. The parties are pleased to report that earlier today they came to an agreement in principle that would resolve all claims in this case, contingent on the execution of a settlement agreement and full general release along with a preference agreement memorializing Thomas’ consideration of and preference to include confidentiality and non-disparagement provisions in the settlement agreement. The parties are now actively working toward memorializing those terms.

In light of the foregoing, the parties have agreed to pause discovery efforts and jointly request that the Court stay all case deadlines *sine die*, including the ESI Protocol due to be submitted to the Court today, so resources are not diverted from the formal memorialization of the settlement to needless and costly discovery. We thank the Court in advance for its attention to this matter.

Respectfully Submitted,



Kristina T. Grimshaw  
Caroline F. Secola  
*Counsel for Defendant*  
FLORENTINO & GRIMSHAW LLC  
800 Westchester Ave., Suite N-641  
Rye Brook, NY 10573



Travis Pierre-Louis  
Crumiller P.C.  
Attorneys for Plaintiff  
16 Court St, Ste 2500  
Brooklyn, NY 11241  
(212) 390-8480

Marjorie Mesidor  
Mesidor PLLC  
260 Madison Avenue, 8th Floor  
New York, New York 10016  
(212) 784-6269

CC: All Counsel of Record (via ECF)